

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF NEW YORK

---

NATIONAL CREDIT ADJUSTERS, LLC,

Plaintiff,

COURT FILE NO.: 1:15-cv-00861

v.

CRED X DEBT RECOVERY, LLC,  
JAMES SAUER, JEFFREY SCHULTZ,  
RICHARD SCHULTZ, AND JOHN  
DOES 1-10

Defendants.

---

**MOTION FOR DEFAULT JUDGMENT**

Plaintiff, National Credit Adjusters, LLC, hereby moves the Court pursuant to Federal Rule of Civil Procedure 55(b) and Local Rule 55(b) to enter default judgment in favor of the Plaintiff and against the Defendants; Cred X Debt Recovery, LLC, James Sauer, Jeffrey Schultz, and Richard Schultz; on the grounds that said Defendants failed to answer or otherwise defend against the Complaint.

Respectfully submitted,

s/ David G. Peltan  
David G. Peltan, Esq.  
Attorney for Plaintiff  
Peltan Law, PLLC  
128 Church Street  
East Aurora, NY 14052  
(716) 374-5431  
[davidpeltan@peltanlaw.com](mailto:davidpeltan@peltanlaw.com)

**CERTIFICATE OF SERVICE**

I hereby certify that on May 4, 2018, I electronically filed the foregoing with the Clerk of the District Court using its CM/ECF system. In addition, copies are being sent via U.S. Postal Service to the defendants at the addresses at which they were served and to their counsel, Michael Benson.

s/ David G. Peltan  
David G. Peltan, Esq.  
Attorney for Plaintiff